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UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Thursday, August 1, 2013

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 75757-2  
Product Name: CDG Solution 3000  
DP Barcode: D412516  
Decision No: 478880  
Action Code: A570  
PC Code: 020503

From: Ian Blackwell, Biologist  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

IE 8/1/2013

Through: Karen Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

A handwritten signature, likely of Karen Hicks, in black ink.

To: Demson Fuller, Acting PM 32/ Nathan Mottl  
Regulatory Management Branch  
Antimicrobials Division (7510P)

Applicant: CDG Environmental LLC

FORMULATION FROM LABEL:

<u>PC Code</u>	<u>Active Ingredient(s):</u>	<u>% by wt.</u>
020503	Chlorine Dioxide	0.3
	<u>Other Ingredient(s):</u>	99.7
	Total:	100.0

I. Background Information: CDG Environmental LLC has submitted a complete set of six acute toxicity studies in support of the acute toxicity data requirements of their product, "CDG Solution 3000". The studies were conducted in 2006, the Chemistry and Toxicology Team (CTT) found it strange that these studies would be submitted seven years after being conducted. The registrant's consultant (Technology Sciences Group, Inc.) tells us the studies were generated years ago for this same product. However, the company's registration failed to be finalized at that time due to circumstances not related to the acute toxicity studies. Now, in 2013, the registrants are seeking product registration again.

II. Findings: Each of the six studies is acceptable.

III. Precautionary Labeling: Label Review System

PRODUCT ID #: 075757-00002

PRODUCT NAME: CDG Solution 3000

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid:

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Label Created by: Ian Blackwell on 08/01/2013 Last Updated by: Ian Blackwell on 08/01/2013

## DATA EVALUATION RECORD

**Product Reg. No.:** 75757-2

**Product Name:** CDG Solution 3000

**1. DP BARCODE:** D412516

**2. PC CODE:** 020503

**3. CURRENT DATE:** August 1, 2013

Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Grade
Acute oral toxicity / rat Eurofins/ Product Safety Labs / 20324 / 9-25-2006	49118601	LD <sub>50</sub> > 5,000 mg/kg	IV	A
Acute dermal toxicity /rabbit / Eurofins/ Product Safety Labs / 20325 / 9-25- 2006	49118602	LD <sub>50</sub> > 5,000 mg/kg	IV	A
Acute inhalation toxicity / rat / Product Safety Labs / 35777 / 2-27-2013	49118603	LC <sub>50</sub> > 2.13 mg/L	IV	A
Primary eye irritation / rabbit / Eurofins/ Product Safety Labs / 20326/ 9-25-2006	49118604	Minimally irritating	III	A
Primary dermal irritation / rabbit / Eurofins/ Product Safety Labs / 20327 / 9-25-2006	49118605	Well-defined erythema in 3/3 @ 72-hours.	III	A
Dermal sensitization / mouse / Product Safety Labs / 35778 / 2-27-2013	49118606	Nonsensitizer	---	A

**Grade Key:** A =Acceptable, U = Unacceptable, D = Data Gap